

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

CAMERON MEYERS, )  
Plaintiff, ) Case No. 1:20-cv-001922-MJD-SEB  
v. )  
WAL-MART STORES EAST, LP and )  
HARBORTOWN INDUSTRIES, INC., )  
Defendants. )

**DEFENDANT HARBORTOWN INDUSTRIES, INC.'S  
PRELIMINARY WITNESS AND EXHIBIT LIST**

Comes now the Defendant, Harbortown Industries, Inc., by counsel, and submits its Preliminary Witness and Exhibit List.

**I. Witnesses**

1. Cameron Meyers;
2. Representative of Wal-Mart Stores East, LP;
3. Dennis Regano and/or another representative of Harbortown Industries, Inc.;
4. Meiling Chen and/or another representative of Harbortown Industries, Inc.;
5. Plaintiff's medical providers including, but not limited to, the following:
  - a. Fayette Regional Health System (Dr. Ronald Sam);
  - b. Brookville Manor Care;
  - c. Beacon Orthopaedics & Sports Medicine (Dr. Adam Miller & PA Russell Reynolds);
  - d. TriHealth Physicians of Indiana (Dr. Thomas Busemeyer and PTA James Allen);

- e. Mercy Health West Hospital;
- f. The Christ Hospital;
- g. Mercy Health Physicians Primary Care (Dr. James Blinzler);
- h. ESS of Connerville, LLC;
- i. Dr. Tejal Bhatt.

- 6. Samantha Bolser (Plaintiff's fiancé);
- 7. Representative of Fumigation Services & Supply, Inc.;
- 8. Michelle Siebert (Wal-Mart);
- 9. Nicole Ballenger (Wal-Mart);
- 10. Cena Graves (Wal-Mart);
- 11. Linda Day (Wal-Mart);
- 12. Representative of Blue Cross/Blue Shield of Tennessee;
- 13. Any witnesses identified by the Plaintiff or Co-Defendant;
- 14. Any witnesses needed for rebuttal and impeachment; and
- 15. Any witnesses revealed through further discovery.

## **II. Exhibits**

- 1. The picture frame involved in the incident in question;
- 2. An exemplar picture frame of the picture frame involved in the accident in question;
- 3. Plaintiff's medical records, bills, and radiology films from the following:
  - a. Fayette Regional Health System (Dr. Ronald Sam);
  - b. Brookville Manor Care;

- c. Beacon Orthopaedics & Sports Medicine (Dr. Adam Miller & PA Russell Reynolds);
- d. TriHealth Physicians of Indiana (Dr. Thomas Busemeyer and PTA James Allen);
- e. Mercy Health West Hospital;
- f. The Christ Hospital;
- g. Mercy Health Physicians Primary Care (Dr. James Blinzler);
- h. ESS of Connersville, LLC;
- i. Dr. Tejal Bhatt

- 4. All accident or incident reports;
- 5. All photographs and videos of the Plaintiff, his injuries, and/or the scene of the accident;
- 6. All documents maintained by the Co-Defendant which identify the picture frame in question;
- 7. Defendant's GS1 Company Prefix Certificate;
- 8. All exhibits identified by the Plaintiff or Co-Defendant;
- 9. All exhibits needed for rebuttal and impeachment; and
- 10. All exhibits revealed through further discovery.

Respectfully submitted,

/s/ John M. DeCastro

John M. DeCastro (#21592-49) Attorney for  
Defendant, Harbortown Industries, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above pleading was served, on February 1, 2021, via postage pre-paid or by electronic service through the CM/ECF system, to the following:

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